

EXHIBIT B



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Transcript of Stephen Chen

Date: July 10, 2018

Case: Micron Technology, Inc. -v- United Microelectronics Corp., et al.

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1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

-----X

3 MICRON TECHNOLOGY, INC.,
4 Plaintiff,

Case No.

5 v.

3:17-CV-06932-JSW

6 UNITED MICROELECTRONICS
7 CORPORATION, FUJIAN JINHUA

8 INTEGRATED CIRCUIT CO.,

9 LTD., and DOES 1-10,

10
11 Defendants.

-----X

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13 Videotaped deposition of STEPHEN CHEN

14
15 Chen & Lin
16 Bank Tower, 12th Floor
205 Tunhwa North Road
17 Taipei 105
TAIWAN

18 TUESDAY, JULY 10, 2018

19 9:07 A.M.

20
21
22
23 Pages 1 - 114

24
25 Reported by Jade K. King.

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Deposition of STEPHEN CHEN, held at:

Chen & Lin

Bank Tower, 12th Floor

205 Tunhwa North Road

Taipei 105

TAIWAN

Pursuant to agreement, before Jade K. King.

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A P P E A R A N C E S

FOR MICRON TECHNOLOGY, INC.:

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FOR UNITED MICROELECTRONICS CORPORATION:

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DAN JOHNSON LAW GROUP

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ALSO PRESENT:

Chester Wong (Videographer)

Chia-Ling Cheng (Main Interpreter)

Yugo Wang (Check Interpreter)

Lucas Chang (UMC in-house counsel)

Chia-Fang Lin (UMC in-house counsel)

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1	A. UMC now.	09:11:05
2	Q. And when you say "UMC", you mean United	09:11:08
3	Microelectronics Corporation; correct?	09:11:11
4	A. Yes.	09:11:12
5	Q. Have you ever had your deposition taken	09:11:17
6	before?	09:11:19
7	A. No.	09:11:24
8	Q. So during the course of the day, I'll be	09:11:25
9	asking you questions and you will be providing	09:11:27
10	answers, and what I'd ask is that you wait for me	09:11:29
11	to complete your question before you give your	09:11:35
12	answer, and likewise I'll try to wait for you to	09:11:38
13	answer before I ask my next question. Is that	09:11:41
14	fair?	09:11:44
15	A. Okay.	09:11:53
16	Q. And during the course of today's	09:11:54
17	deposition, you know a decent amount of English,	09:11:56
18	certainly much more Mandarin than I know, but	09:12:00
19	we'll be using a court -- an interpreter to assist	09:12:03
20	with the questions and the answers. Is that	09:12:06
21	acceptable to you?	09:12:08
22	A. Okay. Thank you. Okay. Thank you.	09:12:10
23	Q. And what I would ask is that if you don't	09:12:21
24	understand a question, that you ask me to clarify.	09:12:23
25	Otherwise, if you answer the question, I'm going	09:12:28

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1	instruction?	10:50:54
2	MR. JOHNSON: You're asking him for the	10:50:56
3	scope of his knowledge as president of Jinhua.	10:50:57
4	MR. MICHAEL: No, I'm asking him whether	10:51:00
5	Jinhua provides UMC with equipment.	10:51:04
6	MR. JOHNSON: And that is based -- he's	10:51:06
7	just testified his understanding of the equipment	10:51:06
8	is based upon his work as president of Jinhua.	10:51:09
9	That is not the scope of this deposition. Jinhua	10:51:12
10	is a party who, as I understand, has not been	10:51:14
11	served and is separately represented.	10:51:18
12	BY MR. MICHAEL:	10:51:21
13	Q. Has UMC ever received equipment for the	10:51:22
14	DRAM project?	10:51:24
15	A. Yes.	10:51:32
16	Q. And does UMC use equipment for its	10:51:33
17	research and development on the DRAM project?	10:51:36
18	A. So for this joint development project, we	10:52:05
19	tried to use the equipment that UMC has already	10:52:08
20	had, as much as possible. For those not enough by	10:52:11
21	the old equipment, then we buy new equipment.	10:52:17
22	Then the new equipment and tool is from Jinhua.	10:52:21
23	Q. What vendor supplies the new equipment	10:52:27
24	and tool that UMC is using on the joint	10:52:29
25	development project?	10:52:33

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1	based on my memory, it should be around 370.	12:17:56
2	3-0 --	12:18:01
3	THE MAIN INTERPRETER: 3-7-0.	12:18:05
4	BY MR. MICHAEL:	12:18:06
5	Q. Can I ask you to turn to Bates number 28.	12:18:06
6	It has the talent recruiting plan chart. Do the	12:18:11
7	manpower numbers in this chart refer to Jinhua	12:18:26
8	only, or does this include UMC as well?	12:18:33
9	A. Jinhua only.	12:18:46
10	Q. And if you turn to page 30, it says "Job	12:19:08
11	Openings for USA" on the right side. Do you see	12:19:19
12	that? And the job openings for the USA include	12:19:23
13	"Category", "Function" and "Job Description";	12:19:33
14	correct?	12:19:39
15	A. It's a pretty standard chart for any job	12:20:02
16	fairs.	12:20:06
17	Q. And these are showing job openings at	12:20:07
18	both UMC and Jinhua; correct?	12:20:10
19	A. Jinhua only, I think. Nothing to do with	12:20:22
20	UMC. Because it's a --	12:20:27
21	Q. If we look at the first category, the	12:20:29
22	first function is DRAM process technology. Isn't	12:20:31
23	that UMC?	12:20:34
24	A. But it was Jinhua who attended the CASPA	12:21:00
25	event for its recruiting purpose. UMC was only	12:21:06

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1	there to support Jinhua with some manpower. It	12:21:11
2	was not UMC there to recruit people.	12:21:15
3	THE CHECK INTERPRETER: Minor	12:21:24
4	clarification to the last sentence.	12:21:24
5	The witness's answer was, "UMC was not	12:21:27
6	there to recruit people."	12:21:30
7	A. So Jinhua -- there was Jinhua there to	12:21:49
8	find people for their operation and manufacturing,	12:21:54
9	not -- not for their R&D. So it was an event for	12:21:58
10	Jinhua, not for UMC.	12:22:02
11	BY MR. MICHAEL:	12:22:05
12	Q. Why does this chart say, "Job openings	12:22:06
13	for research and development", Mr. Chen?	12:22:11
14	MR. JOHNSON: And objection. Lack of	12:22:22
15	foundation. Calls for speculation.	12:22:25
16	You can answer if you know.	12:22:36
17	A. For a newly established company, Jinhua	12:23:02
18	was only there to have a standard chart for job	12:23:05
19	openings, for people in the US who were interested	12:23:08
20	in these job openings. So basically, everything	12:23:12
21	listed in this chart is very similar to any	12:23:15
22	company that has job openings, to have such a job	12:23:19
23	opening description.	12:23:24
24	BY MR. MICHAEL:	12:23:27
25	Q. Mr. Chen, UMC's responsibility under the	12:23:28